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8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. **2012-760**

11 **BERNADETTE MARIE KRUPA, A.K.A.**  
12 **BERNADETTE MARIE HALL**  
13 **33045 Sotelo Drive**  
**Temecula, CA 92592**  
14 **Registered Nurse License No. 520957**

**A C C U S A T I O N**

15 Respondent.

16 Complainant alleges:

17 **PARTIES**

18 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her  
19 official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department  
20 of Consumer Affairs.

21 2. On or about April 10, 1996, the Board of Registered Nursing issued Registered Nurse  
22 License Number 520957 to Bernadette Marie Krupa, also known as Bernadette Marie Hall  
23 ("Respondent"). The Registered Nurse License expired on July 31, 2003, and has not been  
24 renewed.

25 **JURISDICTION**

26 3. This Accusation is brought before the Board of Registered Nursing ("Board"),  
27 Department of Consumer Affairs, under the authority of the following laws. All section  
28 references are to the Business and Professions Code ("Code") unless otherwise indicated.

4. Section 2750 of the Code provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with Code section 2750) of the Nursing Practice Act.

## STATUTORY PROVISIONS

5. Section 118, subdivision (b) of the Code provides, in pertinent part:

“(b) The suspension, expiration, or forfeiture by operation of law of a license issued by a board in the department, or its suspension, forfeiture, or cancellation by order of the board or by order of a court of law, or its surrender without the written consent of the board, shall not, during any period in which it may be renewed, restored, reissued, or reinstated, deprive the board of its authority to institute or continue a disciplinary proceeding against the licensee upon any ground provided by law or to enter an order suspending or revoking the license or otherwise taking disciplinary action against the licensee on any such ground.”

6. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license.

7. Section 2761 of the Code provides, in pertinent part:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(a) Unprofessional conduct, which includes, but is not limited to, the following:

(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action . . .”

8. Section 2811, subdivision (b) of the Code provides:

“Each such license not renewed in accordance with this section shall expire but may within a period of eight years thereafter be reinstated upon payment of the biennial renewal fee and penalty fee required by this chapter and upon submission of such proof of the applicant's qualifications as may be required by the board, except that during such eight-year period no examination shall be required as a condition for the reinstatement of any such expired license which has lapsed solely by reason of nonpayment of the renewal fee. After the expiration of such eight-year period the board may require as a condition of reinstatement that the applicant pass such examination as it deems necessary to determine his present fitness to resume the practice of professional nursing.”

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1 that Respondent successfully completed courses in documentation, legal aspects of nursing, and  
2 nursing ethics. Further, Respondent's license was suspended until such time that she underwent  
3 an evaluation coordinated by the Intervention Project for Nurses, and complied with any and all  
4 terms and conditions imposed as a result of the evaluation. The basis for the Order is as follows:

5 13. On or about May 14, 2008, while employed as a registered nurse at Pasadena Villa  
6 in Orlando, Florida, Respondent placed three Lunesta tablets into her pocket that were supposed  
7 to be destroyed and falsely documented on the medication records that the Lunesta tablets were  
8 destroyed.

9 14. Respondent failed to comply with the above mentioned Final Order and her  
10 licensure status reflects "Null and Void."

11 **SECOND CAUSE FOR DISCIPLINE**

12 **(Unprofessional Conduct)**

13 15. Respondent is subject to disciplinary action under Code section 2761, subdivision  
14 (a), in that Respondent committed acts of unprofessional conduct. The conduct is more  
15 particularly described in paragraphs 13 through 14 inclusive, above, and herein incorporated by  
16 reference.

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1 PRAYER

2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
3 and that following the hearing, the Board of Registered Nursing issue a decision:

4 1. Revoking or suspending Registered Nurse License Number 520957, issued to  
5 Bernadette Marie Krupa, also known as Bernadette Marie Hall;

6 2. Ordering Bernadette Marie Krupa, also known as Bernadette Marie Hall to pay the  
7 Board of Registered Nursing the reasonable costs of the investigation and enforcement of this  
8 case, pursuant to Business and Professions Code section 125.3;

9 3. Taking such other and further action as deemed necessary and proper.

10 DATED: June 25, 2012

11 Louise R. Bailey  
12 LOUISE R. BAILEY, M.ED., RN  
13 Interim Executive Officer  
14 Board of Registered Nursing  
15 Department of Consumer Affairs  
16 State of California  
17 Complainant

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